

MSF

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MEMO ENDORSED

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September 20, 2021

VIA ECF

Hon. Kenneth M. Karas
United States District Court
Southern District of New York
United States Courthouse
300 Quarropas Street
White Plains, NY 10601

Re: *United States v. Darren Lindsay, et al. (Indigo Grant), 21-cr-441-6 (KMK)*

Dear Judge Karas:

I write on behalf of defendant Indigo Grant in the above-referenced matter to respectfully request modification of her conditions of release to permit her to stay out past her 7 p.m. curfew as follows:

- (1) To participate in a business event in Atlanta, GA on October 1, 2021. The event is scheduled for 8-11 p.m., and Ms. Grant would require additional travel time to return home after the event;
- (2) To take her children to a weekly after school sports activity on Wednesdays which runs from 6:30-7:30 p.m. Because of usual traffic in the area, Ms. Grant would return home by 9 p.m.

I have discussed these requests with the government (AUSA Bradley) and Pretrial Services (Officer Barrios) who do not object to the proposed modifications.

Respectfully submitted,

/s/ IH

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Counsel for Defendant Indigo Grant

cc: Counsel of record (via ECF)
Pretrial Services (via email)

SO ORDERED


KENNETH M. KARAS U.S.D.J.

9/21/2021